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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

JOANN ALLEN ERNST, JAMIE
ALLEN, JOANNA ALLEN, AND JACK
ALLEN,

Plaintiffs,

v.

CITY OF EUGENE, A MUNICIPALITY;
Officer JOE KIDD, AND Officer MATT
LOWEN, in their individual capacity, and
as a police official for the City of Eugene,

Defendants.

Case No.: 10-6245-AA

UNOPPOSED MOTION TO EXTEND
DISCOVERY AND PRETRIAL DEADLINES

LR 7.1(a) CERTIFICATION

Counsel for plaintiffs certifies that defendants' attorneys do not oppose this Motion, and
in fact have conferred to achieve the details of this motion.

MOTION

Defendants move for an extension of the deadlines set out in the court's Order of

November 1, 2010. As required by Fed. R. Civ. P. 6(b)(1), there is good cause for the requested extensions of time. The parties need more time to complete discovery and other pretrial matters. This is the parties' second request for an extension of discovery and pretrial deadlines.

Counsel for both parties has a series of trial dates, along with some planned vacation. Counsel have also discussed the issue of several discovery matters to be pursued by the parties, with some likely to require the Court's involvement. For these reasons the parties agreed to these new dates:

Discovery deadlines --- November 18

Dispositive Motions---- December 17

The parties also agree to leave the deadline to complete fact and expert discovery on emotional distress/mental health counseling and treatment to be set after the court's ruling on summary judgment motions. All other existing court deadlines to be vacated and re-set after the court's ruling on dispositive motions.

Dated this 25th day of May 2011,

BY:

s/BRIAN MICHAELS
BRIAN MICHAELS OSB 925607
MARIANNE DUGAN, OSB #93256
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on May 25, 2011, I served or caused to be served a true and complete copy of the foregoing **UNOPPOSED MOTION TO EXTEND**

DEADLINES on the party or parties listed below as follows:

X Via CM / ECF Filing

Via First Class Mail, Postage Prepaid

Via Email

Via Personal Delivery

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Of Attorneys for Defendants

Dated this 25th day of May 2011,

BY:

s/BRIAN MICHAELS
BRIAN MICHAELS OSB 925607